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UNITED STATES DISTRICT COURT
DISTRICT OF MONTANA
MISSOULA DIVISION

DEFENDERS OF WILDLIFE, NATURAL)	
RESOURCES DEFENSE COUNCIL, SIERRA)	CV 08-56-M-DWM
CLUB, HUMANE SOCIETY OF THE UNITED)	
STATES, CENTER FOR BIOLOGICAL)	
DIVERSITY, JACKSON HOLE CONSERVATION)	
ALLIANCE, FRIENDS OF THE CLEARWATER,)	DECLARATION OF
ALLIANCE FOR THE WILD ROCKIES,)	JAMES W. UNSWORTH
OREGON WILD, CASCADIA WILDLANDS)	
<u>PROJECT, WESTERN WATERSHEDS PROJECT,</u>)	

and WILDLANDS PROJECT)
)
<i>Plaintiffs,</i>)
)
v.)
)
H. DALE HALL, U.S. Fish and Wildlife Service)
Director; DIRK KEMPTHORNE, Secretary of the)
Interior; and UNITED STATES FISH AND)
WILDLIFE SERVICE,)
)
<i>Defendants,</i>)
)

1. My name is James W. Unsworth. I am the Chief of the Wildlife Bureau of the Idaho Department of Fish and Game. I have been employed in that position since 2002. I have worked for the Idaho Department of Fish and Game for 25 years with most of my career devoted to research and management of big game animals. I received BS and PhD degrees from the University of Idaho and an MS degree from Montana State University.
2. My responsibilities include oversight of all wildlife management programs in the State of Idaho, including management of gray wolves.
3. The Idaho Fish and Game Commission adopted the Idaho Wolf Population Management Plan 2008-2012 on March 6, 2008 ("Management Plan"). The Management Plan contemplates the establishment of science-based annual mortality management limits, to ensure that the annual mortality from all sources is consistent with the objective of maintaining wolf populations at 2005-2007 population levels (518-732 wolves) during the 5-year post-delisting period. In addition, the Management Plan acknowledges that wolf populations will be managed to maintain wolf distribution and connectivity with adjacent States.

4. Fish and Game recommendations call for a total mortality limit of 328 wolves in 2008, which includes all reported wolf kills – from natural causes, accidents, wolf predation control actions and hunter kills. Reaching the limit would result in an estimated end-of-year population of no less than 612 wolves, when the mortality limit is combined with the estimate of non-reported wolf mortalities. When the statewide limit is reached, all hunting would stop. The limit would be distributed across 12 management zones. When limits in individual zones are reached, hunting in those zones would stop. Management goals for individual zones were established in the Management Plan. Limits were developed based on population parameters that have been measured with radio telemetry and direct observation of wolves by the the Nez Perce Tribe and the Idaho Department of Fish and Game beginning in 1995 (Nadeau et al. 2008, Mitchell et al. 2008) and are similar to population parameters from throughout North America (Adams et al. 2008).
5. The 2008 recommended mortality limit that will be presented to the Idaho Fish and Game Commission for final action is intended to result in a statewide wolf population of no less than 612 wolves (approximately 6 times the USFWS recovery level for Idaho) and was calculated as follows:
 - (a) Beginning wolf population: 738;
 - (b) Estimated spring 2008 population following reproduction: 1063 ($738 \times 1.44 = 1063$);
 - (c) Estimated non-hunting mortality: 213 ($1063 \times 0.2 = 213$);
 - (d) Estimated reported non-hunting mortality: 92 ($213 \times 0.43 = 92$);
 - (e) Estimated harvest to meet IDFG population goal of stabilizing and reducing the population in conflict areas: 238;

- (f) Total statewide limit: $330 (238 \text{ (hunter harvest)} + 92 \text{ (reported non-hunting mortality)}) = 330$
 - (g) Estimated additional non-reported non-hunting mortality: $121 (213 \times 0.57 = 121)$;
 - (h) Estimated statewide minimum population at end of hunting season: $612 (1063 \text{ (spring 2008 population)} - 330 \text{ (hunting + reported non-hunting mortality)} - 121 \text{ (estimated non-reported non-hunting mortality)}) = 612$.
6. The mortality limit recommendation continues to be refined. The figures presented above are slightly different than those previously released to the public.
7. The estimated statewide minimum population is above the 2005 population level of 518 and consistent with the population objectives of the Management Plan. Estimates of mortality, reporting rate, and reproduction are based on radio telemetry and direct observation (Nadeau 2008).
8. At this time the mortality limit is a recommendation only and has not been presented to the Idaho Fish and Game Commission for final action.

I declare, under penalty of perjury, that the foregoing is true and correct.

Executed on May 15, 2008, in Boise, Idaho.



James W. Unsworth
Wildlife Chief
Idaho Department of Fish and Game

Literature Cited:

- Adams, L. G., R. O. Stephenson, B. W. Dale, R. T. Ahgook, and D. J. Demma. 2008. Population dynamics and harvest characteristics of wolves in the Central Brooks Range, Alaska. *Wildlife Monographs* 170.
- Idaho Department of Fish and Game. 2008. Idaho wolf population management plan 2008-2012. Idaho Department of Fish and Game, Boise. 85 pp.
- Nadeau, M. S., C. Mack, J. Holyan, J. Husseman, M. Lucid, B. Thomas, D. Spicer. 2008. Wolf conservation and management in Idaho; progress report 2007. Idaho Department of Fish and Game, 600 South Walnut, Boise, Idaho; Nez Perce Tribe, P.O. Box 365, Lapwai, Idaho. 73pp.
- Mitchell, M. S., D. A. Ausband, C. A. Sime, E. E. Bangs, J. A. Gude, M. D. Jimenez, C. M. Mack, T. J. Meier, M. S. Nadeau, and D. W. Smith. 2008. Estimation of self-sustaining packs for wolves in the Rocky Mountains. *Journal of Wildlife Management*. 72:881-891.